



Harry Kim
Mayor

Wilfred M. Okabe
Managing Director

William A. Kucharski
Director

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Deputy Director

County of Hawai'i
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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January 5, 2018

Mr. Jelani Shareem
EPA Region 9 Compliance Officer
75 Hawthorne Street
San Francisco, California 94105-3901
(Email Shareem.jelani@epa.gov)

Ms. Kate Rao
EPA Region 9 LCC Project Coordinator
75 Hawthorne Street
San Francisco, California 94105-3901
(Email rao.kate@epa.gov)

**SUBJECT: FEDERAL ADMINISTRATIVE ORDER OF CONSENT
EPA DOCKET NO. SDWA-UIC-AOC-2017-0002
PĀHALA AND NĀ'ĀLEHU LARGE CAPACITY CESSPOOLS
JULY 1, 2017 THROUGH DECEMBER 31, 2017 SEMI-ANNUAL REPORT**

Dear Mr. Shareem and Ms. Rao:

The County of Hawai'i Department of Environmental Management is submitting this report in accordance with Section VI, Reporting Requirements, of EPA Docket No. SDWA-UIC-AOC-2017-002 which requires that Semi-Annual Compliance Reports be submitted to the EPA Region 9 Compliance Officer and EPA Region 9 LCC Project Coordinator twice per year.

As per Item 55 of the Administrative Order of Consent (AOC), this report covers the period of July 1, 2017, through December 31, 2017.

Due to the separate facilities and multiple milestones, the report has been submitted in a tabular format for clarity and is provided as **ATTACHMENT (1)**.

Should there be any comments or questions on the report, please contact Dora Beck, P.E., Wastewater Division Chief, at 808-961-8513 (dora.beck@hawaiicounty.gov), Lyle Hirota, P.E.,

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Wastewater Deputy Division Chief, at 808-961-8333 (lyle.hirota@hawaiicounty.gov) or my office at 808-961-8083 (coh.dem@hawaiicounty.gov).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,



William A. Kucharski
Director

WK:mef

Attachment

cc: Harry Kim, Mayor
Wilfred M. Okabe, Managing Director
Joseph K. Kamelamela, Corporation Counsel
Diane A. Noda, DEM Deputy Director
Dora Beck, P.E., Wastewater Division Chief
Tessa Berman, EPA Region 9 Counsel
Sina Pruder, P.E., DOH-WWB
Craig Lekven, P.E., Brown & Caldwell

ADMINISTRATIVE ORDER OF CONSENT
DOCKET SDWA-UIC-AOC-2017-0002
NĀ'ĀLEHU AND PĀHALA LARGE CAPACITY CESSPOOLS
SEMI-ANNUAL REPORT: July 1, 2017 through December 31, 2017

Pāhala Elderly Apartments Cesspool Replacement Project				
Compliance Date	Milestone	Current Status	Pending Actions	Comments
September 28, 2018	Replace Pāhala Elderly Apartments with one or more individual Wastewater Systems (IWS's) and close the existing LCC's	1. Bid Process was completed on 11/30/17. 2. Contractor Award letter issued on 1/4/18.	Execute Contract and issue Notice to Proceed before end of February 2018.	Contract duration is 180 days so project completion is expected to take place by end of August 2018. Per discussion involving EPA, DOH-WWB and COH-WWD, the IWS will not be required to connect to the new County sewer system when it is installed.
Pāhala Community Cesspool Closure Project				
Compliance Date	Milestone	Current Status	Pending Actions	Comments
August 27, 2017	Complete Phase 1 Environmental Site Assessment (ESA) and Preliminary Engineering Report (PER)	1. Phase I ESA and PER were transmitted to EPA on 8/25/17.	None.	Phase I ESA indicated that no further assessment is recommended for the proposed WWTP property.
December 15, 2017	Hold Initial Public Meeting with Affected Community	1. Five (5) "Talk Story" sessions were conducted with the Pāhala community from 12/12/17 to 12/14/17.	None.	Additional public meeting(s) to be planned. Schedule is unknown at this time, but should be prior to EA public comment period.
July 5, 2018	Acquire Land for Pāhala Wastewater Treatment Facility	1. Initial Appraisal Report Completed 3/16/2017.	Acquire land from Kamehameha School via condemnation process.	Recently, WWD was informed of the County requirement that the HRS 343 EA process must be

ATTACHMENT (1)

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NĀ'ĀLEHU AND PĀHALA LARGE CAPACITY CESSPOOLS
SEMI-ANNUAL REPORT: July 1, 2017 through December 31, 2017

Pāhala Community Cesspool Closure Project				
Compliance Date	Milestone	Current Status	Pending Actions	Comments
September 11, 2018	Complete Environmental Information Document (EID) and submit to EPA	1. Brown & Caldwell (Program Manager for COH), subconsultant Wilson Okamoto, COH-WWD, EPA and ERG participated in conference call on 12/19/17 to discuss roles and details of the EID process. 2. Preparation of draft EA/EID in progress.	Action Items from 12/19/17 conference call: 1. EPA to provide response comments to WO on 1/12/18. 2. ERG to review TOC drafted by Wilson Okamoto.	<i>completed prior to land acquisitions.</i>
May 24, 2019	Complete Design of New Collection System	1. Preparing Consultant Contract to begin this scope of work.	TBD	
September 18, 2019	Complete Design of Pāhala Wastewater Treatment Plant (WWTP)	TBD	TBD	Pending 90% NEPA/EA Completion
May 20, 2021	Complete Construction of Pāhala WWTP	TBD	TBD	Pending WWTP Design Completion
June 30, 2021	Connect Existing Collection System to the New Pāhala WWTP and close existing LCC's.	TBD	TBD	Pending WWTP Construction Completion
December 16, 2021	Replace the Existing Collection System and connect the New Collection System to the New Pāhala WWTP	TBD	TBD	Pending Construction Completion of New Collection System

TBD = To Be Determined

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NĀ'ĀLEHU AND PĀHALA LARGE CAPACITY CESSPOOLS
SEMI-ANNUAL REPORT: July 1, 2017 through December 31, 2017

Nā'ālehu Community Cesspool Closure Project				
Compliance Date	Milestone	Current Status	Pending Actions	Comments
January 4, 2018	Complete Phase 1 Environmental Site Assessment (ESA)	1. Phase I ESA was transmitted to EPA on 10/20/17.	None.	Phase I ESA indicated that no further assessment is recommended for the proposed WWTP property
May 28, 2018	Hold Initial Public Meeting with Affected Community	TBD	Discuss approach with CM Maile David.	Possibly hold an initial meeting in February 2018.
June 27, 2018	Acquire Land for Naalehu Wastewater Treatment Facility	1. Appraisal Report has been completed. 2. Offer was made to owner of property planned for effluent disposal.	Acquisition of DLNR property planned for the WWTP facility.	<i>Recently, WWD was informed of the County requirement that the HRS 343 EA process must be completed prior to land acquisitions.</i>
October 25, 2018	Complete Preliminary Engineering Report (PER)		None.	Pending initial public meeting.
October 5, 2019	Complete Environmental Assessment for Nā'ālehu Wastewater Treatment Plant (WWTP)	1. Preparing Consultant Contract to begin this scope of work.	None.	Pending 30% to 60% PER Completion, and initial public meeting.
June 28, 2020	Complete Design of Naalehu Wastewater Treatment Plant (WWTP)	TBD	TBD	Pending 30% PER and 30% EA Completion.
July 21, 2020	Complete Design of New Collection System	TBD	TBD	Pending 100% PER Completion.
February 28, 2022	Complete Construction of the New Nā'ālehu WWTP	TBD	TBD	Pending Design Completion

TBD = To Be Determined

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Nā'ālehu Community Cesspool Closure Project				
Compliance Date	Milestone	Current Status	Pending Actions	Comments
April 17, 2022	Connect Existing Wastewater Collection System to the new WWTP and close existing LCC's	TBD	TBD	Pending WWTP Construction Completion
September 30, 2022	Replace the existing Collection System with a new Collection System and connect to the new Nā'ālehu WWTP	TBD	TBD	Pending Completion of new Collection System Design